

EXHIBIT 18

Allan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDRA GUZMAN,

Plaintiff,

vs.

NEWS CORPORATION, NYP HOLDINGS,
INC., d/b/a THE NEW YORK POST,
and COL ALLAN, in his official
and individual capacities,

Defendants.

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Reported by:
Philip Rizzuti
JOB NO. 46188

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<p>1 Allan</p> <p>2 Q. Did Jesse Angelo ever tell you</p> <p>3 that Leonard Greene complained to him about</p> <p>4 the cartoon?</p> <p>5 A. I don't recall.</p> <p>6 Q. If Leonard Greene complained to</p> <p>7 Jesse Angelo about that cartoon would you have</p> <p>8 expected Jesse Angelo to have told you about</p> <p>9 it?</p> <p>10 A. He may have done. I don't recall.</p> <p>11 Q. That is not my question. My</p> <p>12 question is would you have expected Jesse</p> <p>13 Angelo to have told you about it?</p> <p>14 A. Yes.</p> <p>15 Q. Why?</p> <p>16 A. It would be the right thing to do.</p> <p>17 Q. Did anyone in human resources ever</p> <p>18 tell you that Leonard Greene had complained</p> <p>19 about the monkey cartoon?</p> <p>20 A. I don't recall.</p> <p>21 Q. Well Mr. Allan if your black</p> <p>22 reporters -- strike that.</p> <p>23 If you learned that your black</p> <p>24 reporters complained about the monkey cartoon</p> <p>25 you would recall that; right?</p>	<p>1 Allan</p> <p>2 A. Excuse me.</p> <p>3 Q. If you knew at one point that your</p> <p>4 black reporters had complained about the</p> <p>5 monkey cartoon that is not something that you</p> <p>6 would forget; right?</p> <p>7 A. I guess yes, I wouldn't forget.</p> <p>8 Q. As you sit here now do you know if</p> <p>9 Leonard Greene ever complained about the</p> <p>10 monkey cartoon?</p> <p>11 A. I don't know.</p> <p>12 Q. Did you ever talk to him about the</p> <p>13 monkey cartoon?</p> <p>14 A. No.</p> <p>15 Q. Mr. Allan, I am showing you what</p> <p>16 has been marked as Allan Deposition Exhibit</p> <p>17 17, please take a moment to review it?</p> <p>18 A. Sure.</p> <p>19 (Allan Exhibit 17, affidavit of</p> <p>20 Leonard Greene, marked for</p> <p>21 identification, as of this date.)</p> <p>22 MR. LIPPNER: Take your time and</p> <p>23 read the whole thing please.</p> <p>24 A. Yes.</p> <p>25 Q. Mr. Allan, do you agree that</p>
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<p>1 Allan</p> <p>2 Leonard Greene has been subjected to race</p> <p>3 discrimination during his employment at the</p> <p>4 Post?</p> <p>5 A. I do not.</p> <p>6 Q. Did he ever apply to become an</p> <p>7 editor?</p> <p>8 A. I don't know.</p> <p>9 Q. Did he ever apply to become a</p> <p>10 columnist?</p> <p>11 A. Yes.</p> <p>12 Q. When did he apply to become a</p> <p>13 columnist?</p> <p>14 A. I don't recall.</p> <p>15 Q. How many times did he apply to</p> <p>16 become a columnist?</p> <p>17 A. A couple.</p> <p>18 Q. Why didn't he become a columnist</p> <p>19 at the New York Post?</p> <p>20 A. I'm sorry?</p> <p>21 Q. Why hasn't Leonard Greene become a</p> <p>22 columnist at the New York Post?</p> <p>23 A. Because I don't think that he</p> <p>24 would be a good columnist for the newspaper.</p> <p>25 Q. Why not sir?</p>	<p>1 Allan</p> <p>2 MR. LIPPNER: Objection. This</p> <p>3 goes to your editorial.</p> <p>4 MR. THOMPSON: It does not. The</p> <p>5 fact that I am asking him why he didn't,</p> <p>6 Mr. Lippner, please don't invoke this</p> <p>7 baseless privilege to coach the witness.</p> <p>8 My question is why didn't he think that</p> <p>9 Leonard Greene would make a good</p> <p>10 columnist at the newspaper.</p> <p>11 MR. LERNER: You can talk about</p> <p>12 what you regard as his qualifications for</p> <p>13 being a columnist at the New York Post.</p> <p>14 A. I think that Leonard is an</p> <p>15 excellent reporter, an excellent writer, but I</p> <p>16 don't believe that he would make a strong</p> <p>17 columnist for the newspaper.</p> <p>18 Q. Why not?</p> <p>19 A. I think it takes a certain kind of</p> <p>20 attitude. In many ways Leonard is too even</p> <p>21 tempered, too nice to be a good columnist for</p> <p>22 the newspaper.</p> <p>23 Q. Well he has the writing skills to</p> <p>24 be a columnist; right?</p> <p>25 A. Yes, I would agree with that.</p>

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<p>1 Allan</p> <p>2 Q. He has past experience as a</p> <p>3 columnist at other newspapers; correct?</p> <p>4 A. Yes.</p> <p>5 Q. You would agree would you not that</p> <p>6 you made the decision -- strike that.</p> <p>7 Isn't it true Mr. Allan that you</p> <p>8 made the decision to deny Leonard Greene the</p> <p>9 opportunity to work as a columnist at the</p> <p>10 newspaper when he applied?</p> <p>11 A. That is correct.</p> <p>12 Q. And Leonard Greene is</p> <p>13 African-American; correct?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Well you would agree that working</p> <p>16 as a columnist requires a certain skill set;</p> <p>17 right?</p> <p>18 A. Yes.</p> <p>19 Q. What is that skill set that a</p> <p>20 columnist at the New York Post is required to</p> <p>21 have?</p> <p>22 A. Strong opinions.</p> <p>23 Q. That is it?</p> <p>24 A. Not all.</p> <p>25 Q. Tell us everything that you --</p>	<p>1 Allan</p> <p>2 A. Strong opinions.</p> <p>3 Q. What else?</p> <p>4 A. A deep knowledge of politics.</p> <p>5 Q. A deep knowledge of politics?</p> <p>6 A. Yes.</p> <p>7 Q. So every columnists who works at</p> <p>8 the Post has a deep knowledge of politics?</p> <p>9 A. No.</p> <p>10 Q. I am asking you to describe any</p> <p>11 skill set that you believe a columnist needs</p> <p>12 to have in order to work at the Post?</p> <p>13 A. They need to have been an expert,</p> <p>14 to have some expertise.</p> <p>15 Q. What else?</p> <p>16 A. They need to have an attitude.</p> <p>17 Q. Anything else?</p> <p>18 A. That will do.</p> <p>19 Q. They need to be able -- they need</p> <p>20 to be excellent writers; correct?</p> <p>21 A. In part.</p> <p>22 Q. They need to have journalistic</p> <p>23 experience?</p> <p>24 A. That is not enough.</p> <p>25 Q. Sorry?</p>
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<p>1 Allan</p> <p>2 A. That is not enough.</p> <p>3 Q. Really; so is it your opinion that</p> <p>4 a person who has no journalistic experience</p> <p>5 could be qualified to work as a columnist at</p> <p>6 the New York Post?</p> <p>7 MR. LERNER: Objection.</p> <p>8 A. If they have expertise, yes.</p> <p>9 Q. Expertise in what?</p> <p>10 A. Derivatives.</p> <p>11 Q. Anything else?</p> <p>12 A. Sex.</p> <p>13 Q. Sex?</p> <p>14 A. Sure.</p> <p>15 Q. What type of experience would you</p> <p>16 expect a columnist to have in sex?</p> <p>17 A. Considerable.</p> <p>18 Q. Considerable. What do you mean by</p> <p>19 that?</p> <p>20 A. If the person was going to be</p> <p>21 experienced in sex they would have had</p> <p>22 considerable sex.</p> <p>23 Q. In terms of engaging in sexual</p> <p>24 activity; correct?</p> <p>25 A. Yes.</p>	<p>1 Allan</p> <p>2 Q. What journalistic experience did</p> <p>3 Ashley Dupree have before you hired her at the</p> <p>4 New York Post as a columnist?</p> <p>5 A. She was a hooker.</p> <p>6 Q. I asked you what journalistic</p> <p>7 experience she had before she joined the New</p> <p>8 York Post?</p> <p>9 A. She was a hooker.</p> <p>10 Q. Do you believe being a hooker is</p> <p>11 the same as having journalistic experience?</p> <p>12 A. No.</p> <p>13 Q. So my question is not whether she</p> <p>14 was a hooker, my question is what journalistic</p> <p>15 experience did Ms. Dupree have before you</p> <p>16 hired her as a columnist at the New York Post?</p> <p>17 A. Zero.</p> <p>18 Q. What writing experience did Ms.</p> <p>19 Dupree have before you hired her as a</p> <p>20 columnist at the New York Post?</p> <p>21 A. Zero.</p> <p>22 Q. What experience did she have</p> <p>23 working at a newspaper before you hired her as</p> <p>24 a columnist at the New York Post?</p> <p>25 A. Zero.</p>

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<p>1 Allan</p> <p>2 Q. What experience did she have</p> <p>3 working as a columnist before you hired her as</p> <p>4 a columnist at the New York Post?</p> <p>5 A. Zero.</p> <p>6 Q. Is it your testimony Mr. Allan</p> <p>7 that Ashley Dupree who you described as having</p> <p>8 experience as a hooker was more qualified to</p> <p>9 work as a columnist at the New York Post than</p> <p>10 Leonard Greene?</p> <p>11 MR. LERNER: Objection.</p> <p>12 A. That is not my testimony.</p> <p>13 Q. Would you agree Mr. Allan that --</p> <p>14 strike that.</p> <p>15 Would you agree Mr. Allan that</p> <p>16 Leonard Greene was more qualified to work as a</p> <p>17 columnist at the New York Post than Ashley</p> <p>18 Dupree?</p> <p>19 MR. LERNER: Objection.</p> <p>20 A. I would argue that Ashley Dupree</p> <p>21 is more qualified to write a sex column at the</p> <p>22 New York Post than Leonard Greene.</p> <p>23 Q. Why, simply because she was a</p> <p>24 prostitute?</p> <p>25 A. I think that is helpful.</p>	<p>1 Allan</p> <p>2 Q. Any other reason?</p> <p>3 A. She is a woman.</p> <p>4 Q. Any other reason?</p> <p>5 A. No.</p> <p>6 Q. So you believe that she is</p> <p>7 qualified to work as a columnist at the New</p> <p>8 York Post because she has had experience being</p> <p>9 a prostitute and she is a women?</p> <p>10 A. She is qualified as a sex</p> <p>11 columnist, yes.</p> <p>12 Q. Would you agree that the position</p> <p>13 of columnist at the New York Post is</p> <p>14 prestigious?</p> <p>15 A. Some. I wouldn't agree that it is</p> <p>16 prestigious to be the sex columnist.</p> <p>17 Q. How much is Ashley Dupree being</p> <p>18 paid annually as a columnist for the New York</p> <p>19 Post?</p> <p>20 MR. LERNER: Hold on. That is --</p> <p>21 first of all this is confidential.</p> <p>22 Second of all what is the relevance of</p> <p>23 what Ashley Dupree is making?</p> <p>24 MR. THOMPSON: The relevance is</p> <p>25 you have a black long time employee at</p>
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<p>1 Allan</p> <p>2 the Post, Leonard Greene, who Mr. Allan</p> <p>3 testified is an excellent writer,</p> <p>4 excellent reporter, a man of integrity</p> <p>5 and honesty, someone who has worked in</p> <p>6 the past as a columnist who has applied</p> <p>7 to be a columnist and Mr. Allan denied</p> <p>8 him. Yet Mr. Allan hired a white former</p> <p>9 prostitute with no journalistic</p> <p>10 experience, no experience working as a</p> <p>11 reporter, no experience working at a</p> <p>12 newspaper as a columnist at the paper.</p> <p>13 MR. LERNER: To do an entirely</p> <p>14 different job than Leonard Greene was</p> <p>15 qualified to do.</p> <p>16 MR. THOMPSON: You can make that</p> <p>17 argument, but Leonard Greene applied for</p> <p>18 a columnist position and was denied by</p> <p>19 Mr. Allan. Ashley Dupree who he hired</p> <p>20 had no experience but being a prostitute</p> <p>21 and a woman.</p> <p>22 MR. LERNER: She was hired for a</p> <p>23 different job, not even comparable.</p> <p>24 MR. THOMPSON: Are you going to</p> <p>25 instruct him not to answer?</p>	<p>1 Allan</p> <p>2 MR. LERNER: Yes.</p> <p>3 DI Q. Are you going to answer the</p> <p>4 question I just asked you?</p> <p>5 A. I am going to act on the advice of</p> <p>6 counsel.</p> <p>7 MR. THOMPSON: We have that marked</p> <p>8 for another ruling.</p> <p>9 And just so you know opposing</p> <p>10 counsel that I did not call Judge Ellis</p> <p>11 earlier because I didn't want to make</p> <p>12 multiple calls with him. We will put</p> <p>13 this in an application to the court and</p> <p>14 deal with it fully in terms of all the</p> <p>15 times that you instructed Mr. Allan not</p> <p>16 to answer questions.</p> <p>17 Q. Is Ashley Dupree still employed at</p> <p>18 the Post?</p> <p>19 A. Yes.</p> <p>20 Q. Does she report to you?</p> <p>21 A. No.</p> <p>22 Q. Who does she report to?</p> <p>23 A. Steve Lynch.</p> <p>24 Q. Now do you know if anyone at News</p> <p>25 Corp. has hacked into Sandra Guzman's cell</p>

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1 Col Allan
 2 work with respect to the monkey cartoon from
 3 February 2009?
 4 MR. LERNER: Objection.
 5 A I don't recall.
 6 Q Did you ever discuss that cartoon
 7 with anyone from Rubenstein?
 8 A I don't recall.
 9 Q Did Rubenstein review the editorial
 10 that was issued about the cartoon?
 11 A I don't recall.
 12 Q Did Rubenstein review the statement
 13 issued by Mr. Murdoch about the cartoon?
 14 A I don't recall.
 15 Q Who is Richard Prince?
 16 A Excuse me?
 17 Q Richard Prince, do you know who he
 18 is?
 19 A No, sir.
 20 Q Do you know whether Mr. Prince ever
 21 wrote an article about the New York Post?
 22 A I don't.
 23 Q Do you recall, perhaps, anyone from
 24 Rubenstein handling any matter involving Richard
 25 Prince?

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1 Col Allan
 2 it's bad for you.
 3 Q I agree with that, but if somebody
 4 took a break to have a cigarette would that be
 5 considered time theft from the company?
 6 A No, sir.
 7 Q What about running routine errands to
 8 go to the drug store or the bank?
 9 MR. LERNER: Objection.
 10 A I can't speculate.
 11 Q Are you aware of any reporter for the
 12 Post ever running such errands during the day?
 13 A I'm sure they have.
 14 Q During the workday?
 15 A Sure.
 16 Q What about going to the gym, are you
 17 aware of any New York Post reporters ever going to
 18 the gym during a workday?
 19 MR. LERNER: Objection. Don't guess.
 20 A I don't know.
 21 Q Are you ever aware of any New York
 22 Post reporter going to the movies during a
 23 workday?
 24 MR. LERNER: Objection.
 25 A No.

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1 Col Allan
 2 A No, sir.
 3 Q Are you aware of the work schedule
 4 for weekday reporters at the New York Post?
 5 A No, sir.
 6 Q Do you know about how many hours per
 7 week New York Post reporters are expected to log?
 8 A No, sir.
 9 Q Is it your expectation that during
 10 the eight hours from nine to five that New York
 11 Post reporters working during the week spend every
 12 minute of that time, apart from lunch, performing
 13 work for the New York Post?
 14 MR. LERNER: Objection.
 15 A Yes, sir.
 16 Q What about bathroom breaks?
 17 A Excuse me?
 18 Q What about bathroom breaks, would
 19 they be expect expected to take those?
 20 A I believe so.
 21 Q What about smoke breaks?
 22 A Pardon?
 23 MR. LERNER: Smoke.
 24 Q Smoke breaks, breaks to smoke.
 25 A We try to discourage it. Smoking,

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1 Col Allan
 2 Q Before the filing of the current
 3 lawsuits, were you aware that Austin Fenner
 4 complained about the February 2009 cartoon?
 5 A No, sir.
 6 Q And did you discuss, following the
 7 publication of the February '09 cartoon, discuss
 8 the need for someone from the human resources
 9 department to talk with minority employees at the
 10 Post specifically?
 11 MR. LERNER: Objection.
 12 A I'm sorry. Can you repeat the
 13 question?
 14 Q I can.
 15 Following the publication of the
 16 February 2009 cartoon, did you talk with anybody
 17 at the Post, apart from counsel, regarding the
 18 need for a human resources representative to speak
 19 specifically with minority employees at the Post?
 20 MR. LERNER: Objection.
 21 A I don't recall.
 22 Q What about the need for HR to talk
 23 with black employees at the Post?
 24 A I don't recall.
 25 Q Are you aware of whether or not